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7 *RB VENTURE PARTNERS LLC*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 RB VENTURE PARTNERS LLC, a Nevada
12 limited-liability company,

13 Plaintiff,

14 vs.

15 DUANE BENNETT PARNHAM, an
16 individual; and DOES 1 through 10, inclusive,

17 Defendants.

18 DUANE BENNETT PARNHAM, an
19 individual; and DOES 1 through 10, inclusive

20 Counterclaimant,

21 vs,

22 RB VENTURE PARTNERS LLC, a Nevada
23 limited-liability company,

Counterdefendant.

Case No. 2:23-cv-00837-RFB-BNW

**STIPULATION AND PROPOSED
ORDER TO STAY DISCOVERY (FIRST
REQUEST)**

24 Plaintiff and Counterdefendant, RB VENTURE PARTNERS LLC, by and through its attorneys
25 of record, Lewis Brisbois Bisgaard & Smith LLP, and Defendant and Counterclaimant, DUANE
26 BENNETT PARNHAM, by and through his attorneys of record, Womble Bond Dickinson
27 (collectively “the Parties”), hereby stipulate as follows:

28 ///

Discovery shall be stayed pending the Court's ruling on RB VENTURE PARTNERS LLC's Motion to Dismiss (ECF No. 55) DUANE BENNETT PARNHAM's First Amended Counterclaim (ECF No. 50).

Under the Court's Order (ECF No. 51) on the *Stipulation to Continue All Currently Established Deadlines (First Request)*, the following discovery deadlines are in place:

Event	Existing Deadline
Initial Expert Disclosures	Tuesday, June 10, 2025
Rebuttal Expert Disclosures	Thursday, July 10, 2025
Discovery Cutoff	Wednesday, August 20, 2025

The Court's ruling on RB VENTURES PARTNERS LLC's Motion to Dismiss may change the scope of the claims at issue in this action; therefore, good cause exists to stay discovery pending the Court's ruling on the Motion.

This is the First Request to Stay Discovery.

IT IS SO STIPULATED:

WOMBLE BOND DICKINSON LLP

LEWIS BRISBOIS BISGAARD & SMITH

/s/ John Bragonje

/s/ Philip J. Tacason

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Attorneys for Defendant/Counterclaimant,
Duane Bennett Parnham

Attorneys for Plaintiff/Counterdefendant, *RB VENTURE PARTNERS LLC*

IT IS FURTHER ORDERED that
the parties must file an amended DPSO
within 14 days of the Court's ruling on
the motion to dismiss.

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 3/20/2025

STIPULATION AND PROPOSED ORDER TO STAY DISCOVERY (FIRST REQUEST)